

# **Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template**

## **EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: February 12, 2018
2. Name of company(s) covered by this certification: Valley Telecommunications Association, Inc
3. Form 499 Filer ID: 801177
4. Name of signatory: Jeff Symens
5. Title of signatory: GM/CEO
6. Certification:

I, Jeff Symens, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed 

**Attachments:**      Accompanying Statement explaining CPNI procedures  
                                 Explanation of actions taken against data brokers (if applicable)  
                                 Summary of customer complaints (if applicable)



**The Home Team Advantage.**

**Valley Telecommunications  
Cooperative**

**PO Box 7 – 102 Main St S**

**Herreid, SD 57632-0007**

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February 12, 2018

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

RE: EB Docket No. 06-36  
Annual CPNI Certification

Dear Ms. Dortch:

Attached is the annual CPNI certification filing covering the year of 2017, pursuant to 47 C.F.R § 64.2009(e), for Valley Telecommunications Cooperative Association, Inc. 801177.

Sincerely,

Kelly Brandner  
Customer Service/Marketing Manager

Attachment

**Customer Proprietary Network Information (CPNI)  
Documentation of Operating Procedures  
for  
Valley Telecommunications Coop. Assn., Inc  
PO Box 7 – 102 Main St S  
Herreid SD 57632-0007**

Valley Telecommunications Cooperative Association, Inc. ("Valley") has implemented the following procedures to ensure that it is compliant with CPNI rules.

- Valley has appointed a CPNI Compliance Officer as a central point of contact for employees, customers and any others with questions about Valley's CPNI responsibilities. This individual will train employees and maintain and secure Valley's CPNI files. All marketing and sales campaigns will be reviewed and approved by the CPNI Compliance Officer.
- Valley trains employees on the CPNI rules on an annual basis. New employees that have access to CPNI are trained when hired. The training includes, but is not limited to, when employees are and are not authorized to use CPNI, and the authentication methods the company is using. Employees are instructed that if they ever have any questions regarding the use of CPNI, they should contact the CPNI Compliance Officer. After training, employees sign a certification that they have been trained, and the certification is retained in Valley's files.
- Valley has established disciplinary procedures for violations and for improper use of CPNI. The disciplinary procedures are discussed with employees so that they understand the process.
- Valley authenticates all customers. For in-office visits, Valley requires a valid photo ID. For a customer initiated call, Valley requires a password that is not based on readily available biographical or account information. If the customer forgets the password, Valley re-authenticates the customer without the use of readily available biographical or account information and establishes a new password for the customer. To re-authenticate the customer, Valley calls the customer back at the telephone number of record. If the customer is not at the telephone number of record, Valley takes down the question and mails the customer a letter to the address of record with the information they requested.
- Valley has a process in place for handling breaches, which includes notification to the USSS (605-330-4565) and FBI (605-224-1331), and notification to the affected customers and/or public. The company maintains a record of any breach that includes the date of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. An explanation of any action taken against data brokers and a summary of all customer complaints will be included in the annual certification that is filed with the FCC. Records of breaches will be kept for a minimum of two years.

- Since Valley uses the opt-out method, it provides CPNI notification, along with the request to use CPNI, to customers every two years. If any customers have previously opted out, Valley does not send the notification again since the customer's denial to use CPNI is valid until the customer makes a change. The company will provide written notice, within five business days, to the FCC of any instance where the opt-out mechanisms do not work properly.
- Customer account records clearly show the approval/denial status for the account prior to the use of CPNI. Catalog code of CPNIOU and a general service order has been setup that when closed will show up in customer service records & a bold red opt out will appear on the customer's screen along with an icon in the alerts column.
- Valley retains CPNI notification and approval records for a minimum of two years.
- Valley Telecommunications Coop. Assn., Inc has established a process for maintaining a record of any marketing campaign of its own or its affiliates that use customers' CPNI. The record will include a description of the campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. These records are maintained for a minimum of one year.
- Valley Telecommunications Coop. Assn., Inc has established a supervisory review process for any outbound marketing efforts to ensure that supervisory approval has been obtained for any proposed outbound marketing. The CPNI Compliance Officer must review and approve all outbound marketing campaigns to ensure that they are in compliance with the CPNI rules.
- Valley Telecommunications Coop. Assn., Inc will not provide CPNI to third parties, including joint venture partners and independent contractors, without the customer's approval via the opt-in process.
- Valley employees that have access to CPNI are provided with a manual for their reference to be used whenever they have questions or need clarification regarding CPNI. If the employee still has questions or needs further clarification after reviewing the manual, the employee is instructed to contact the CPNI Compliance Officer.